




358849

MEMORANDUM**SMF-5J****DATE:** August 6, 2009**SUBJECT:** Review of the Revision 3 Quality Assurance Project Plan (QAPP) for the PRP-Lead Remedial Investigation/Feasibility Studies (RI/FS) Activities for the **Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site** in Allegan County, Michigan**FROM:** Richard L Byvik 
Field Services Section (FSS)**TO:** Sam Chummar
Remedial Project Manager (RPM)

I do not recommend approval of the Revision 3 QAPP for the PRP-lead RI/FS activities for the **Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site** in Allegan County, Michigan. The subject QAPP was received by FSS on June 29, 2009, Log-in # 3794.

A Title and Approval Page with signature lines for all the project responsible officials must be provided. Also, some Standard Operating Procedures may have to be provided. Any questions concerning this memorandum contact Richard L Byvik 312-353-3114.

CC: Steve Ostrodka, SMF-5J

**ALLIED PAPER, INC./PORTAGE CREEK/KALAMAZOO RIVER
SUPERFUND SITE
ALLEGAN COUNTY, MICHIGAN**

MULTI-AREA QUALITY ASSURANCE PROJECT PLAN (QAPP)

1) QAPP Worksheet #1 Title and Approval Page

Signature Lines of the Laboratory Managers for **Weyerhaeuser Analysis & Testing Laboratory (WATS)** and **Columbia Analytical Services, Inc. (CAS)** must be included, also, **Summit Environmental Testing (SET)**, if relevant.

A Signature Line for the **U.S. EPA Quality Assurance Reviewer** must be included.

Signature Line should be included for the **Michigan Department of Environmental Quality (MDEQ)** Project Manager, if appropriate.

2) Include a lines and/or boxes for the CAS Laboratory Manager and the SET Laboratory Manager, if relevant, in the following QAPP Worksheets, where applicable:

QAPP Worksheet #3 Distribution List

QAPP Worksheet #4-2

QAPP Worksheet #5-4 and #5-5

QAPP Worksheet #6-4 and #6-5

QAPP Worksheet #8

QAPP Worksheet #11-5 and QAPP Worksheet #11-6

QAPP Worksheet #14

QAPP Worksheet #26 QAPP Worksheet #27

QAPP Worksheet #31-4 and QAPP Worksheet #31-5

QAPP Worksheet #32-34 and QAPP Worksheet #32-4

QAPP Worksheet #33 QAPP Worksheet #34 QAPP Worksheet #35

3) QAPP Worksheet #10-5 Step 4

Please provide Figure 2-4.

4) QAPP Worksheet #10-6, editorial, Page 2 of 2

Please Label **Step 4** and provide Figure 2-4.

5) QAPP Worksheet #11-6 and QAPP Worksheet #10-6

QAPP Worksheet #10-6 indicates soil samples will be analyzed for most all parameters, but QAPP Worksheet #11-6 implies that samples will be analyzed for VOCs and PCBs. Verify the parameters.

6) QAPP Worksheet #15-4 Page 16 of 16

The Laboratory MDLs are greater than the Laboratory RLs. Please verify.

7) QAPP Worksheet #18-4

Please attach Page 1 of 3 and Page 2 of 3.

8) QAPP Worksheet #30 Page 1 of 2, editorial

For the **SET** address amend Cuyhoga Falls, to Cuyahoga Falls.

9) QAPP Worksheets #36 and #37

The "U.S. EPA Contract Laboratory Program (CLP) National Functional Guidelines" are only applicable for the CLP Protocols. Data Validation SOPs should be prepared according to the project Data Quality Objectives and laboratory SOPs. The CLP Guidelines have been updated.

ATTACHMENT 1-5
STANDARD OPERATING PROCEDURES (SOPs)

COLUMBIA ANALYTICAL SERVICES, INC. (CAS)
KELSO, WASHINGTON

- I** **CAS must provide SOP C-4 Mercury in Water by Atomic Fluorescence Spectrometry, MET-1631. See QAPP Worksheets #12-9 and #23.**
- II** **METHYL MERCURY IN WATER BY DISTALLATION, AQUEOUS ETHYLATION, PURGE AND TRAP, AND CVAS SOP No.:MET-1630W**

Table 2, Page 31 of 31, errata

Verify references to Sections 9.2, 9.3, 9.4 and 9.5. References are found in Section 12.
Define superscript 1 for MS/MSD.

SUMMIT ENVIRONMENTAL TESTING (SET)
CUYHOGA FALLS, OHIO

SET must provide SOP Method for Polychlorinated Biphenyls (PCBs) by Gas Chromatography, SOP 8082, if relevant, and preparation and cleanup SOPs. See QAPP Worksheets #12-4 and #23. SET must provide SOPs for sample log-in, storage, internal chain of custody, and disposal.

ATTACHMENT A
ADDITION/REVISIONS TO TEXT OF FIELD SAMPLING PLAN

Standard Operating Procedure F-16 Surface Water Sampling Procedures

An SOP should be prepared for collecting Low-Level Mercury and Methyl Mercury samples. For guidance in preparing SOP see **MDEQ RRD OPERATIONAL MEMORANDUM NO.2 SAMPLING AND ANALYSIS – ATTACHMENT 7** and **U.S. EPA Method 1669**, unless other project field sampling SOPs have addressed this.